

JOSEPH ONEBANE (1917-1987)
JOHN G. TORIAN, II (1936-1991)

JAMES E. DIAZ, SR.
TIMOTHY J. MCNAMARA
EDWARD C. ABELL, JR.
LAWRENCE L. LEWIS, III†
ROBERT M. MAHONY
DOUGLAS W. TRUXILLO*
RANDALL C. SONGY
MICHAEL G. DURAND
GREG GUIDRY*
JOSEPH L. LEMOINE, JR.††
MARK L. RILEY
GRAHAM N. SMITH*
GORDON T. WHITMAN
GARY P. KRAUS
RICHARD J. PETRE, JR.
CHARLES J. BOUDREAUX, JR.
THOMAS G. SMART
ROGER E. ISHEE**
STEVEN C. LANZA
JESSE D. LAMBERT††*
BRENT G. SONNIER***
GREG R. MIER††
FRANK H. SPRUIELL, JR.*
MARIA FABRE MANUEL
MICHAEL P. MARAIST
JOAN LABBE BOUDREAUX

ONEBANE LAW FIRM

A Professional Corporation

SUITE 600 VERSAILLES CENTRE
102 VERSAILLES BOULEVARD (70501)
POST OFFICE BOX 3507
LAFAYETTE, LOUISIANA 70502-3507

FAX: (337) 266-1232
TDD: (337) 266-1217
TELEPHONE: (337) 237-2660

www.onebane.com

February 26, 2004

APPLICATION

OF COUNSEL
WILLIAM E. KELLNER
MARK B. OLIVER
CRAIG A. RYAN
GREGORY K. MOROUX
FREDERICK R. PARKER, JR.††
MICHAEL D. SKINNER

SHREVEPORT OFFICE
400 TRAVIS STREET, SUITE 1000
SHREVEPORT, LA 71101
TELEPHONE (318) 674-9770
FAX (318) 674-9775

§LL.M. IN HEALTH LAW
†BOARD CERTIFIED TAX ATTORNEY
LL.M. IN TAXATION
††REGISTERED PATENT ATTORNEY

*ALSO ADMITTED IN TEXAS
**ALSO ADMITTED IN MISSISSIPPI
***ALSO ADMITTED IN OKLAHOMA

Honorable James H. Welsh
Commissioner of Conservation
P. O. Box 94275
Baton Rouge, LA 70804-9275

RE: Substitute Unit Well Application
Bourgeois Sand, Reservoir A
Rousseau Field
Lafourche Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **POGO PRODUCING COMPANY** for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters related to the **Bourgeois Sand, Reservoir A** in the **Rousseau Field**, Lafourche Parish, Louisiana, for which rules and regulations were adopted and a single drilling and producing unit, designated **BOURGEOIS RA SUA**, was established by Office of Conservation Order No. 343-EE, dated effective August 20, 2002; to wit:

1. To permit the applicant, Pogo Producing Company, to drill, designate and utilize the Pogo Producing Co. - Parro No. 1 Well as the substitute unit well for **BOURGEOIS RA SUA** at the location shown on the plat attached hereto and made a part hereof, which location is in compliance with the spacing provisions of Office of Conservation Order No. 343-EE.
2. To consider such other matters as may be pertinent to this application as shown by the evidence presented at the public hearing.

The existing unit well for BOURGEOIS RA SUA, the Pogo Producing Co. - Kearns No. 3 Well, has ceased to produce and the applicant is, therefore, requesting designation of a substitute unit well. The proposed substitute unit well is necessary to drain a portion of the unit which cannot be drained by any existing well in the unit. There is attached a plat showing the exterior limits of the unit, the location of the existing unit well, and the location of the proposed substitute unit well, the Pogo Producing Co. - Parro No. 1 Well.

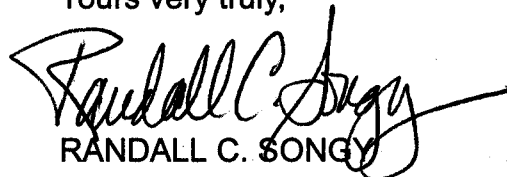
The location of the proposed substitute unit well is in compliance with the spacing provisions of Office of Conservation Order No. 343-EE even though it is less than 330 feet from two different unit boundaries, because Order 343-EE specifically provides that any future substitute unit wells for BOURGEOIS RA SUA shall be exempt from any spacing requirements.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **David Comeaux, Leon Comeaux & Associates, 305 La Rue France, Lafayette, LA 70508; (Phone: 337-233-9839).**

There is attached hereto and made a part hereof the plat referenced herein and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is enclosed our check in the sum of \$755.00 payable to the Office of Conservation, representing the required hearing application fee.

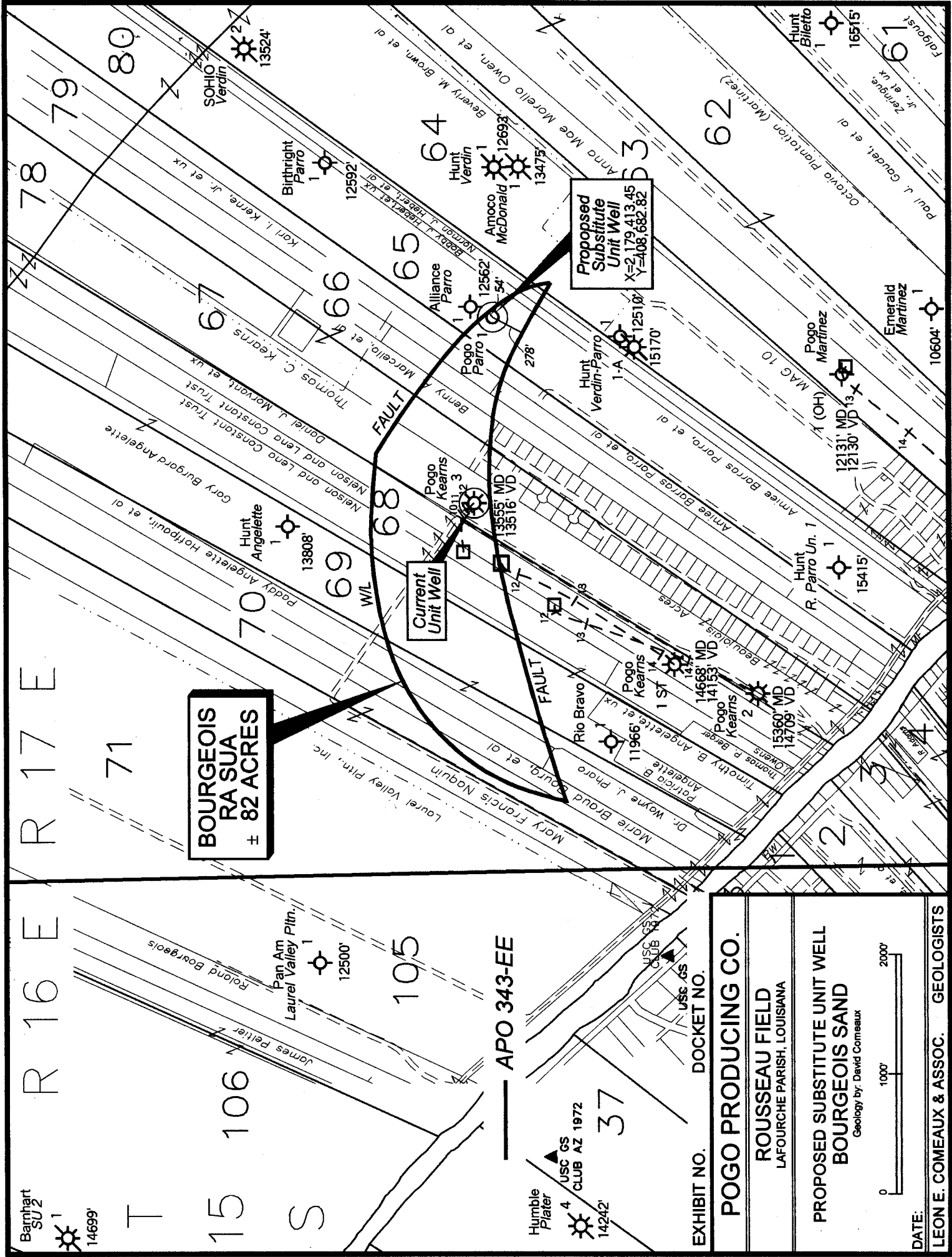
Yours very truly,


RANDALL C. SONGY

RCS/elg/bad
Enclosures

cc: Mr. Richard Hudson,
Office of Conservation

All Interested Owners, Represented Parties,
and Interested Parties



**BOURGEOIS
RA SUA
± 82 ACRES**

**Current
Unit Well**

**Proposed
Substitute
Unit Well**
X=2179.413,45
Y=408.682,82

EXHIBIT NO.	DOCKET NO.
POGO PRODUCING CO.	
ROUSSEAU FIELD LAFOURCHE PARISH, LOUISIANA	
PROPOSED SUBSTITUTE UNIT WELL BOURGEOIS SAND Geology by: David Comeaux	
DATE:	1000' 2000'
LEONE E. COMEAUX & ASSOC. GEOLOGISTS	